

JASON M. FRIERSON
 United States Attorney
 District of Nevada
 Nevada Bar Number 7709
 SKYLER H. PEARSON
 Assistant United States Attorney
 501 Las Vegas Boulevard South, Suite 1100
 Las Vegas, Nevada 89101
 Tel: (702) 388-6336
 Skyler.Pearson@usdoj.gov
Attorneys for the United States

**UNITED STATES DISTRICT COURT
 IN AND FOR THE DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	Case No.: 2:23-mj-1096-BNW
v.)	
)	STIPULATION TO CLOSE CASE
VICTOR CHAVEZ ROSAS,)	
)	
Defendant.)	
)	
_____)	

IT IS STIPULATED AND AGREED, by and between JASON M. FRIERSON, United States Attorney, and Skyler Pearson, Assistant United States Attorney, counsel for the United States of America, and Manuel O. Montelongo, Esquire, counsel for the defendant Victor Chavez Rosas, that the above-captioned matter be closed.

This Stipulation is entered into based upon the following:

1. On or about February 21, 2024, defendant entered into a Petty Offense Agreement with the United States in which he agreed to plead guilty to Count One of the Complaint, Reckless Driving, in violation of 36 C.F.R. § 4.23(b), and N.R.S. § 484B.653(1).
See ECF No. 4.
2. The parties agreed to recommend that defendant be sentenced to one year of unsupervised probation with the following special conditions: (i) pay a \$500.00 fine and a

1 mandatory \$10 penalty assessment; (ii) attend and complete the Lower Court Counseling's (1)
2 DUI course and (2) Victim Impact Panel; (iii) complete an eight (8) hour online alcohol
3 awareness course; (iv) not return to Lake Mead National Recreation Area for a period of six
4 (6) months; and (v) not violate any local, state, or federal laws for a period of six (6) months.
5 If the defendant successfully completes his obligations within six months of unsupervised
6 probation, the court will allow the defendant to withdraw his guilty plea to count one and the
7 government will move to amend count one to Unsafe Operations.
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9 3. On February 21, 2024, this Court sentenced defendant pursuant to the parties'
10 plea agreement. *See* ECF No. 4.

11 4. Since commencing his term of unsupervised probation, defendant has
12 successfully completed conditions (i), (ii), (iii), and (iv).

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5. As such, the parties jointly request that the defendant be allowed to withdraw her guilty plea to count one and the government moves to amend count one to Unsafe Operations. The parties also jointly request that the above-captioned matter be closed.

Respectfully submitted,

/s/ Manuel O. Montelongo
MANUEL O. MONTELONGO, ESQ.
Attorney for Defendant
VICTOR CHAVEZ ROSAS

UNITED STATES DISTRICT COURT
IN AND FOR THE DISTRICT OF NEVADA

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
vs.)
)
VICTOR CHAVEZ ROSAS,)
)
Defendant.)
)
_____)

Case No.: 2:23-mj-1096-BNW

ORDER TO CLOSE THE CASE

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that: defendant has successfully completed the conditions of his sentencing.

ORDER

IT IS HEREBY ORDERED that the defendant is allowed to withdraw his guilty plea to count one and that the count one be amended to Unsafe Operations.

IT IS HEREBY ORDERED that the parties move the Court in the above-captioned matter case be closed, as all requirements have been completed.

DATED this 16 day of September, 2024


UNITED STATES MAGISTRATE JUDGE